

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 KAREN BEAUSEY (CABN 155258)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-6598
8 FAX: (415) 436-7234
Karen.Beausey@usdoj.gov

Attorneys for Plaintiff

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,) CASE NO.
14 Plaintiff,)
15 v.) **VERIFIED COMPLAINT FOR FORFEITURE**
16 \$40,000 in United States Currency,) **IN REM**
17 Defendant.)
18

19 The United States of America, by its attorneys, David L. Anderson, United States Attorney, and
20 Karen Beausey, Assistant United States Attorney for the Northern District of California, brings this
21 complaint and alleges as follows:
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23 **NATURE OF THE ACTION**

24 1. This is a judicial forfeiture action, as authorized by Title 21, United States Code, Section
25 §§ 853 and 881(a)(6), involving the seizure and forfeiture to the use and benefit of the United States of
26 America the following property:

27 \$40,000 in United States Currency seized by law enforcement officers from James SPARKS on
28

1 or about September 10, 2019, and currently in the custody of the United States Drug
2 Enforcement Administration (“DEA”);
3 (hereinafter, “Defendant Property”), as property constituting, or derived from, any proceeds obtained,
4 directly or indirectly, as a result of a violation of 21 U.S.C. §§ 841 and/or 846, and thereby forfeitable
5 pursuant to 21 U.S.C. § 881(a)(6).

6 **JURISDICTION AND VENUE**

7 2. This Court has jurisdiction under 28 U.S.C. §§ 1345 and 1355, and 21 U.S.C.
8 § 881(a)(6).

9 3. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355 and 1395 because the acts
10 or omissions giving rise to the forfeiture occurred in this district and the Defendant Property is located in
11 this district.

12 4. Intra-district venue is proper in the San Francisco within the Northern District of
13 California.

14 **PARTIES**

15 5. Plaintiff is the United States of America.

16 6. The Defendant Property consists of \$40,000 in United States Currency seized by law
17 enforcement officers from James SPARKS on or about September 10, 2019, and currently in the custody
18 of the DEA.

19 **FACTS**

20 7. On September 10, 2019, Cincinnati DEA Task Force Agent Ken Coyle received
21 information from a confidential source (CS) that on September 9, 2019, SPARKS, Alberto Flores, and
22 Andrea Ospina made round trip reservations to fly from Dallas, Texas to San Francisco International
23 Airport (SFO) on September 10, 2019 (the next day), via American Airlines Flight #1260. Their flight
24 was scheduled to arrive in San Francisco at 12:17 p.m. local time, but was delayed and did not arrive
25 until around 1:40 p.m. SPARKS, Flores, and Ospina were scheduled to depart San Francisco for their
26
27
28

1 return flight to Dallas on September 11, 2019 at 6:00 p.m., less than 30 hours after arriving in San
2 Francisco.

3 8. SPARKS paid \$706.60 for each of the three airline tickets, and paid for each reservation
4 on a credit card. SPARKS, Flores and Ospina sat together on the flight (in seats 34D, 34E, and 34F).
5 Neither of the travelers checked any luggage on their San Francisco-bound flight.
6

7 9. TFO Coyle conducted a criminal history check of SPARKS, Flores, and Ospina, and
8 found none had any prior criminal history. TFO Coyle passed the information he had learned about
9 SPARKS, Flores, and Ospina to San Francisco DEA Task Force #2 at SFO.

10 10. Task Force #2 officer Blake Molyneux conducted a computer records check of SPARKS
11 and located a Texas Driver's License.

12 11. In TFO Molyneux's training and experience, he knew that most travelers attempt to book
13 airline travel at least two weeks in advance of the flight date in order to receive the lowest possible fare.
14 He also knew that most travelers to the San Francisco Bay Area who come as tourists seek to stay for at
15 least two days, and that most working people would consider paying \$760 in airfare to visit the area for
16 less than 30 hours to be an extravagance. On the other hand, in his experience individuals who fly to
17 San Francisco with the intention of purchasing illegal drugs frequently make their airline reservations
18 shortly before the date of travel and frequently spend very little time (often less than two days) in
19 California before returning to their city of origin.
20

21 12. In light of the information related to them by TFO Coyle and what they viewed as the
22 suspicious nature of SPARKS', Flores', and Ospina's travel, San Francisco Task Force #2 officers
23 decided to meet SPARKS, Flores, and Ospina at SFO and to seek an interview with any or all of them
24 regarding the purpose of their travel to California.
25

26 13. Accordingly, on September 10, 2019, at approximately 1:20 p.m., TFO Blake Molyneux
27 other Task Force #2 agents established surveillance at American Airlines gate 45B in anticipation of the
28

1 arrival of passengers from American Airlines Flight #1260. At approximately 1:50 p.m., TFO
2 Molyneux and TFO Steve Maes observed SPARKS (identified via comparison with his Texas Driver's
3 License photograph) exit the gate in the company of a male companion (subsequently identified as
4 Flores) and a female companion (subsequently identified as Ospina). All three were seen talking
5 together as they walked together in the direction of the exit of the terminal. TFO Molyneux noticed
6 Sparks was carrying a small backpack as his carry-on item.

8 14. A few minutes after SPARKS and his companions emerged from the aircraft, at
9 approximately 1:55 p.m., Task Force agents approached the three traveling companions to conduct
10 consensual conversations. TFO Maes and TFO Victor Bertolozzi approached Flores, TFO Ariana
11 Daggett approached Ospina, and TFO Molyneux approached SPARKS (SA George Krieg joined TFO
12 Molyneux and SPARKS a few minutes after their conversation began). TFO Molyneux called out to
13 SPARKS by saying "James?" SPARKS acknowledged he was James and TFO Molyneux asked if
14 SPARKS would speak with him. SPARKS replied, "yeah," indicating his agreement to speak with TFO
15 Molyneux.
16

17 15. Before asking SPARKS any other questions, TFO Molyneux informed SPARKS he was
18 not under arrest and that he was free to leave at any time, which SPARKS appeared to understand.
19 Throughout the ensuing conversation, TFO Molyneux (and later, SA Krieg) stood to the side of
20 SPARKS at a conversational distance, and situated himself so as to avoid blocking SPARKS' path of
21 travel or access to the door. In addition, throughout the conversation TFO Molyneux (and later, SA
22 Krieg) spoke in a calm, normal tone of voice at a conversational volume loud enough for SPARKS to be
23 able to hear but not so loud as to be easily overheard by other people in the vicinity. Throughout the
24 conversation SPARKS spoke in a similarly calm and conversational manner at an appropriate volume.
25

26 16. All TFOs were wearing plain clothes and were not visibly displaying firearms or other
27 weapons, and each identified themselves as agents of the Drug Enforcement Administration and
28

1 displayed their law enforcement credentials so they could be inspected by the traveling companions.
2 The conversations all took place in close proximity to each other, approximately 30 feet to 40 feet from
3 the exit from the terminal to the curb, and at all times SPARKS, Flores, and Opsina had clear,
4 unobstructed paths to walk away from the conversations had they chosen to do so.

5
6 17. TFO Molyneux asked SPARKS if he was traveling with Flores and Opsina, and SPARKS
7 stated that he was. SPARKS noted he had grown up with Flores. SPARKS stated he had come from
8 Dallas, Texas, and in response to TFO Molyneux's question stated that he lived in Texas but was
9 originally from California. TFO Molyneux asked why SPARKS had traveled to California that day and
10 SPARKS stated he was there to visit for a few days and possibly to visit family. TFO Molyneux knew
11 SPARKS was scheduled to fly back to Dallas in less than 30 hours, which when one considered travel
12 time to and from the airport and the time necessary to clear security at the airport, scarcely gave
13 SPARKS one full day to visit the area or to see family.

14
15 18. TFO Molyneux asked where SPARKS and his companions planned to stay during their
16 visit, and SPARKS stated he had not made any plans or booked a hotel reservation or reserved a car, but
17 that the trio might rent a car and might rent an AirBNB.

18
19 19. TFO Molyneux explained to SPARKS that he and the other officers were part of a task
20 force attempting to control the drug trafficking trade through the use of airports. TFO Molyneux asked
21 SPARKS if he was carrying any drugs or anything illegal, and SPARKS said he was not. TFO
22 Molyneux asked SPARKS for his consent to search his luggage. In response, SPARKS said, "sure."
23 SPARKS then removed his backpack from his back and handed it to TFO Molyneux, which TFO
24 Molyneux understood to be a further indication of his consent.

25
26 20. Based on SPARKS' consent, TFO Molyneux began to search SPARKS' backpack. As
27 he began to search, TFO Molyneux noticed SPARKS appeared to grow increasingly nervous and
28 became quiet. Upon opening SPARKS' backpack TFO Molyneux noticed there was no clothing in the

1 backpack. Instead, TFO Molyneux found several rubber-banded bundles of U.S. Currency; two bundles
2 inside SPARKS' wallet (which was found inside the backpack), and two bundles in interior pockets of
3 the backpack. A quick examination revealed the cash appeared to be all \$100 bills and \$50 bills.

4 21. In his training and experience, TFO Molyneux recognized the manner in which the
5 currency was packed as consistent with narcotics smuggling. Specifically, the bundling of the money in
6 rubber-banded stacks, the use of \$50 and \$100 bills (rather than an assortment of denominations), and
7 the concealment of the money were methods of transporting money that TFO Molyneux had observed
8 used by narcotics traffickers in other investigations in which he had worked.

10 22. TFO Molyneux asked SPARKS how much money he had in his possession, but SPARKS
11 did not offer a response. TFO Molyneux asked SPARKS several times if SPARKS could estimate how
12 much money he was carrying, but SPARKS only stated that he did not know. TFO Molyneux asked
13 SPARKS if the money belonged to SPARKS, but SPARKS did not answer. Instead, he stood in silence
14 and stared at the encounter taking place nearby between TFO Maes and Flores. To TFO Molyneux,
15 SPARKS appeared to be frozen with nervousness.

17 23. TFO Molyneux again asked SPARKS about the purpose of his trip to California and why
18 he had so much money with him. SPARKS reaffirmed that he was just on vacation with Flores and
19 Ospina for a few days, but offered no information about the money he was carrying. TFO Molyneux
20 asked SPARKS if the money belonged to Flores, and SPARKS would not answer. TFO Molyneux
21 asked whether Flores and Ospina had money with them, and SPARKS stated he did not know.

23 24. Having evaded answering questions about the money found in his backpack for several
24 minutes, SPARKS changed his mind and began answering questions. SPARKS stated he was merely a
25 courier of the money, and that "they" (who he would not identify) told him to bring the money from
26 Texas to California. SPARKS said he had brought money to California on several other occasions for
27 "them," and that he assumed the money was to purchase drugs but he did not know for sure because he
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1 was only a courier. SPARKS said “they” paid him for his travel, but he did not state whether he was
2 paid a fee to bring the money to California. TFO Molyneux asked why he would act as a money courier
3 if he was not paid a fee, but SPARKS did not respond. TFO Molyneux asked whether Flores and
4 Ospina were also couriers, and SPARKS said he did not know and whatever they were doing was on
5 them and their own doing. SPARKS could not provide any details about where he was supposed to take
6 the money once he arrived in California. He insisted he truly did not know how much money he was
7 transporting, and said he was only doing his job as a courier moving money from Texas to California.
8 He then refused to provide any further details about the money in his possession or his work couriering
9 money.
10

11 25. In his training and experience TFO Molyneux knows it is highly unusually for legitimate
12 tourists and visitors to travel with large amounts of cash, and that they (like most people in their daily
13 lives) generally prefer to use credit cards and other forms of electronic payment. He further knows that
14 individuals involved in the purchase and/or sale of controlled substances frequently bring large amounts
15 of cash when traveling to California to purchase controlled substances or to pay for previously-
16 purchased controlled substances, and that individuals who sell controlled substances usually prefer to be
17 paid in cash to avoid creating a paper trail.
18

19 26. TFO Molyneux asked SPARKS about his finances, and SPARKS said he had three jobs:
20 working in an ice cream parlor; working as a barista; and working as a tattoo artist. SPARKS said none
21 of his jobs paid very well and that he was just starting out as a tattoo artist. He could not recall how
22 much income he made in 2019, but said he had filed his income taxes.
23

24 27. TFO Molyneux explained to SPARKS the U.S. Currency was going to be detained based
25 on the totality of the circumstances, as he suspected the money was brought to California with the intent
26 to purchase drugs or was the proceeds of a drug transaction. SPARKS did not protest the seizure and
27 did not provide any further explanation for being in possession of such a large sum of U.S. Currency.
28

1 28. TFO Molyneux secured currency in a DEA self-sealing evidence envelope, which was
2 witnessed by SA Krieg and SPARKS. TFO Molyneux provided SPARKS with a receipt for the
3 currency, and explained the asset forfeiture process to SPARKS, who appeared to understand. TFO
4 Molyneux and SA Krieg provided their business contact information on the receipt and SPARKS signed
5 the receipt and was given a copy. SPARKS also signed the DEA self-sealing envelope as the
6 owner/possessor of the currency. SPARKS stated he did not have any questions or an attorney, and the
7 interview ended at approximately 2:10 p.m., approximately 15 minutes after it began.

9 29. Shortly after separating from SPARKS, TFO Molyneux placed the DEA self-sealing
10 evidence envelope containing the U.S. Currency under a luggage cart near a United Airlines luggage
11 carousel. Earlier that morning (at approximately 10:00 a.m.), TFO Bertolozzi had his certified drug
12 detection canine, Cooper, examine the area around the United Airlines luggage carousel and the
13 surround area. At that time, Cooper did not alert to any drug odors in the area. At approximately 2:18
14 p.m., after the bag containing the currency seized from SPARKS had been placed under the luggage
15 cart, Cooper alerted to the odor of drugs when he came upon the luggage cart, indicating to TFO
16 Bertolozzi that the odor of narcotics was emanating from the currency.

18 30. TFO Molyneux maintained custody and control of the DEA self-sealing evidence
19 envelope until he and TFO Bertolozzi transported it to Bank of America. Once there, the money in
20 SPARKS' possession was counted and determined to be \$40,000.00.

22 31. TFO Molyneux subsequently obtained a report of SPARKS' work history from the State
23 of Texas. According to the State of Texas, for 2018 and 2019 combined, SPARKS had a total of
24 \$18,322.10 of reportable income: \$15,293.67 in 2019 and only \$3,028.39 in 2018. Notably, SPARKS'
25 sources of income included a machine operating company, coffee shops, and an ice cream parlor, but no
26 tattoo parlors.

27 32. Travel records from American Airlines reveal that despite having little income in 2019,
28

1 SPARKS flew between Dallas and California on at least one prior occasion that year and to Europe on at
2 least two occasions. Specifically, on April 22, 2019, SPARKS flew from Dallas Fort Worth Airport
3 (DFW) to SFO, and returned to Dallas four days later, on April 26, 2019, on a flight from LAX to DFW.
4 On March 19, 2019, SPARKS flew from DFW to Madrid, Spain, and then on to Berlin, Germany. He
5 returned to Madrid from Germany on March 26, 2019 (American Airlines had no record of SPARKS'
6 return to the United States). And on November 8, 2019, SPARKS flew from JFK Airport in New York
7 City to London (again, American Airlines had no record of SPARKS' return to the United States).
8

9 33. In his training and experience, TFO Molyneux recognizes such substantial travel by
10 someone with so little reported income and who claims employment as a barista, an ice cream parlor
11 employee, and a tattoo artist, as evidence that the travel is being funded by criminal proceeds. It should
12 be noted that these travel records only relate to travel taken on American Airlines.
13

14 34. The DEA timely initiated administrative forfeiture proceedings against the Defendant
15 Property. On November 27, 2019, DEA received a timely claim for the Defendant Property from
16 SPARKS. Pursuant to 18 U.S.C. § 983(a)(3)(A) the United States thereafter had ninety (90) days within
17 which to initiate judicial forfeiture proceedings. The instant complaint is filed within that 90-day time
18 limit.
19

20 **CLAIM FOR RELIEF**

21 1. The United States incorporates by reference the allegations in paragraphs 1 through 34 as
22 though fully set forth herein.

23 2. Title 21, United States Code, Section 841(a) prohibits the manufacture, distribution, or
24 dispensing, and possession with the intent to distribute a controlled substance.

25 3. Title 21, United States Code, Section 846 makes it a crime to attempt or to conspire to
26 violate Title 21, United States Code, Chapter 13, Subchapter I, including Title 21, United States Code,
27 Sections 841(a).
28

1 4. Title 21, United States Code, Section 853 provides that any person convicted of violating
2 (among other things) Title 21, United States Code, Sections 841(a) and 846 shall forfeit any property
3 constituting or derived from any proceeds the person obtained, directly or indirectly, as the result of that
4 violation, and any of the person's property used, or intended to be used, in any manner or part, to
5 commit or to facilitate the commission of that offense.
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7 5. Title 21, United States Code, Section 881(a)(6), provides, in part, for the forfeiture of all
8 moneys, securities or other things of value furnished or intended to be furnished to a person in exchange
9 for a controlled substance, all proceeds traceable to such an exchange, and all moneys and securities
10 used or intended to be used to facilitate any violation of Title 21, United States Code, Chapter 13,
11 Subchapter I, including violations of Title 21, United States Code, Sections 841(a) and 846.
12

13 6. In light of the foregoing, and considering the totality of the circumstances, there is
14 probable cause to believe that the Defendant Property represents proceeds traceable to money, securities
15 or other things of value furnished to a person in exchange for a controlled substance, or intended to do
16 so, in violation of Title 21, United States Code, Sections 841(a) and 846, and thus subject to forfeiture
17 under Title 21, United States Code, Sections 853 and 881(a)(6).
18

19 WHEREFORE, plaintiff United States of America requests that due process issue to enforce the
20 forfeiture of the Defendant Property; that notice be given to all interested parties to appear and show
21 cause why forfeiture should not be decreed; and that judgment of forfeiture be entered; that the Court
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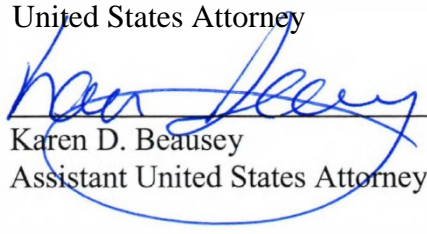
28 ///

1 enter judgment forfeiting the Defendant Property; and that the United States be awarded such other
2 relief as may be proper and just.

3
4 DATED: February 25, 2020

Respectfully submitted,

5 DAVID L. ANDERSON
6 United States Attorney

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8 Karen D. Beausey
9 Assistant United States Attorney
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VERIFICATION

I, Drug Enforcement Administration Task Force Agent Blake Molyneux, state as follows:

1. I am a Task Force Agent with the Drug Enforcement Administration. I am a case agent assigned to this case. As such, I am familiar with the facts and the investigation leading to the filing of this Complaint for Forfeiture.

2. I have read the Complaint and believe the allegations contained therein to be true.

* * * * *

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of February, 2020, in SAN FRANCISCO, California.


Task Force Agent Blake Molyneux
Drug Enforcement Administration

CIVIL COVER SHEET

The JS-CAND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

AUSA Karen Beauey
450 Golden Gate Avenue
San Francisco, CA 94102

DEFENDANTS

\$40,000 in United States Currency

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
110 Insurance	PERSONAL INJURY	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC § 881	422 Appeal 28 USC § 158	375 False Claims Act
120 Marine	310 Airplane	690 Other	423 Withdrawal 28 USC § 157	376 Qui Tam (31 USC § 3729(a))
130 Miller Act	315 Airplane Product Liability	LABOR	PROPERTY RIGHTS	400 State Reapportionment
140 Negotiable Instrument	320 Assault, Libel & Slander	710 Fair Labor Standards Act	820 Copyrights	410 Antitrust
150 Recovery of Overpayment Of Veteran's Benefits	330 Federal Employers' Liability	720 Labor/Management Relations	830 Patent	430 Banks and Banking
151 Medicare Act	340 Marine	740 Railway Labor Act	835 Patent—Abbreviated New Drug Application	450 Commerce
152 Recovery of Defaulted Student Loans (Excludes Veterans)	345 Marine Product Liability	751 Family and Medical Leave Act	840 Trademark	460 Deportation
153 Recovery of Overpayment of Veteran's Benefits	350 Motor Vehicle	790 Other Labor Litigation	SOCIAL SECURITY	470 Racketeer Influenced & Corrupt Organizations
160 Stockholders' Suits	355 Motor Vehicle Product Liability	791 Employee Retirement Income Security Act	861 HIA (1395ff)	480 Consumer Credit
190 Other Contract	360 Other Personal Injury	IMMIGRATION	862 Black Lung (923)	485 Telephone Consumer Protection Act
195 Contract Product Liability	362 Personal Injury -Medical Malpractice	462 Naturalization Application	863 DIWC/DIWW (405(g))	490 Cable/Sat TV
196 Franchise	CIVIL RIGHTS	465 Other Immigration Actions	864 SSID Title XVI	850 Securities/Commodities/Exchange
REAL PROPERTY	PRISONER PETITIONS		865 RSI (405(g))	890 Other Statutory Actions
210 Land Condemnation	440 Other Civil Rights	HABEAS CORPUS	FEDERAL TAX SUITS	891 Agricultural Acts
220 Foreclosure	441 Voting	463 Alien Detainee	870 Taxes (U.S. Plaintiff or Defendant)	893 Environmental Matters
230 Rent Lease & Ejectment	442 Employment	510 Motions to Vacate Sentence	871 IRS—Third Party 26 USC § 7609	895 Freedom of Information Act
240 Torts to Land	443 Housing/Accommodations	530 General		896 Arbitration
245 Tort Product Liability	445 Amer. w/Disabilities—Employment	535 Death Penalty		899 Administrative Procedure Act/Review or Appeal of Agency Decision
290 All Other Real Property	446 Amer. w/Disabilities—Other	OTHER		950 Constitutionality of State Statutes
	448 Education	540 Mandamus & Other		
		550 Civil Rights		
		555 Prison Condition		
		560 Civil Detainee—Conditions of Confinement		

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation—Transfer ☐ 8 Multidistrict Litigation—Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Title 21, United States Code, Sections 853 and 881(a)(6)

Brief description of cause:

Drug Related Forfeiture

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P.

DEMAND \$

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S), IF ANY (See instructions):

JUDGE

DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only)

☒ SAN FRANCISCO/OAKLAND☐ SAN JOSE☐ EUREKA-MCKINLEYVILLE

DATE 02/25/2020

SIGNATURE OF ATTORNEY OF RECORD

